

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS PAUL M. LION  
(OCA/USPS-T24-90-93)  
September 17, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T24-90. Please refer to the supplement to LR-H-188, Workbook "Cost98.xls," Sheet "TY98 Costs." Please confirm that the figures in the table, "Attributable Costs for Post Office Boxes," represent the TYBR attributable costs. If you do not confirm, please explain.

OCA/USPS-T24-91. Please refer to the supplement to LR-H-188, Workbook "Cost98.xls," Sheet "TY98 Costs," and the column "TOTAL ACCRUED (\$000)."

- a. For the "ALL OTHER" category, please show the derivation of the figure \$55,716,746. Please show all calculations, and provide citations to any figures used.
- b. For the "TOTAL" row, please provide a specific page citation for the figure \$60,790,731.

OCA/USPS-T24-92. Please refer to the supplement to LR-H-188, Workbook "Cost98.xls," Sheet "Unit Costs."

- a. Please confirm that the TYBR attributable "Allocated Costs" of Fee Group E are \$34,179,581. If you do not confirm, please explain.
- b. Please confirm that the post office box fee for all box sizes in Fee Group E is \$0. If you do not confirm, please explain.
- c. Assuming the same cost coverage for post office boxes in the TYBR, please confirm that post office box fees in Fee Groups A, B, C and D are higher than they otherwise would be in order to cover the attributable allocated costs of Fee Group E. If you do not confirm, please explain.

- d. Please confirm that boxholders paying Fee Group E fees , i.e., \$0, are generating costs which are paid for by boxholders paying Fee Group A, B, C and D fees. If you do not confirm, please explain.
- e. Please explain why the Postal Service does not treat the attributable allocated costs of Fee Group E as an institutional cost.
- f. Would it be more consistent with the policy that *mailers* pay the delivery costs of carrier delivery (rather than recipients) if Fee Group E costs were paid for by all mailers and not other boxholders alone? Please explain fully.

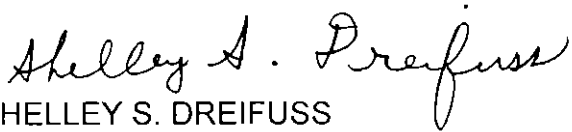
OCA/USPS-T24-93. Please refer to the supplement to LR-H-188, Workbook

"POBox98.xls," Sheet "TYAR Revenues."

- a. Please confirm that the figure \$43, "Revenue per box (w/oE)," was computed by dividing the "TYAR Revenues" (\$632,143,987) by the "TYBR Number of Boxes" (14,699,437). If you do not confirm, please explain.
- b. Please confirm that the TYAR "Revenue per box (w/oE)" should be \$45.42 (\$632,143,987 / 13,918,499). If you do not confirm, please explain.
- c. Please confirm that the figure \$40.47, "Revenue per box (w/E)," was computed by dividing the "TYAR Revenues" (\$632,143,987) by the "TYBR Number of Boxes" (15,620,769). If you do not confirm, please explain.
- d. Please confirm that the TYAR "Revenue per box (w/E)" should be \$42.60 (\$632,143,987 / 13,918,499). If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
SHELLEY S. DREIFUSS  
Attorney

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September 17, 1997